

ZMO LAW PLLC

MEMO ENDORSED

August 6, 2025

Via ECF and email

Hon. Valerie E. Caproni
Southern District of New York
United States Courthouse
500 Pearl Street, Courtroom 20C
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/7/2025

RE: *U.S. v. Christopher Reese*, 24 Cr. 402 (VEC)

Dear Judge Caproni:

This office represents Christopher Reese in the above-captioned matter. We write to request permission to file the unredacted version of Mr. Reese's sentencing memorandum, as well as the entirety of the two exhibits attached to the memorandum, under seal.

Exhibit A is a report by Dr. Sanford Drob which details his examination of and conclusions regarding Mr. Reese's mental health. Exhibit B is a report by mitigation specialist Kathleen O'Boyle, which describes in detail Mr. Reese's myriad health conditions. The proposed redactions in the sentencing memorandum all describe Mr. Reese's mental and physical health conditions.

This information constitutes Mr. Reese's private medical information, and as such we respectfully request the Court order that Mr. Reese's unredacted sentencing memorandum, as well as Exhibits A and B, be filed under seal. The government does not object to this request.

ZMO LAW PLLC

Thank you for your attention to this case.

Very truly yours,

Tess Cohen

Tess Cohen
Partner

Encls. Unredacted Sentencing Memorandum, Exhibit A, Exhibit B, Copy of Sentencing Memorandum with Proposed Redactions Highlighted (via email only)

CC: AUSA Timothy Josiah Pertz, AUSA Kingdar Prussien (via ECF and email)

Application GRANTED.

SO ORDERED.

 8/7/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE